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Attorneys for Defendant and Counterclaimant  
ChipMOS Technologies, Inc.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

Freescale Semiconductor, Inc., a  
corporation,

Plaintiff,

vs.

ChipMOS Technologies, Inc., a  
corporation,

Defendant.

CASE NO. 5:09-CV-03689-JF-PSG

**JOINT PROPOSED  
SCHEDULING ORDER**

Complaint filed: July 13, 2009

Trial Date: Not Set

**JURY TRIAL DEMANDED**

Plaintiff Freescale Semiconductor Inc. (“Freescale”) and Defendant ChipMOS Technologies Inc. (“ChipMOS”) submit this Joint Proposed Scheduling Order:

Close of Fact Discovery	April 29
Expert witness report due/party with the burden of proof to designate expert witnesses	May 20
Rebuttal expert witness report due/designate rebuttal expert witnesses	June 3
Close of Expert Discovery	June 17
Deadline for filing Dispositive Motions	July 15
Response to Dispositive Motions	July 29
Reply to Dispositive Motions	August 5
Parties to Meet and Confer regarding pre-trial preparation	August 12
Pre-Trial Conference Statement	August 19
Motions in <i>Limine</i>	August 26
Pre-trial Conference	September 2
Proposed jury instructions; Proposed content of a jury questionnaire; Proposed voir dire questions	September 9
Jury Selection	September 16
Jury Trial	September 19

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2  
3 DATED: February 7, 2011

By: /s/ Greg L. Lippetz

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Counsel for Plaintiff and Counterdefendant  
Freescale Semiconductor, Inc.

10 In accordance with General Order No. 45, Section X(B), the above signatory attests that  
11 concurrence in the filing of this document has been obtained from the signatory below.  
12

13 DATED: February 7, 2011

14 COOLEY LLP  
15 RONALD S. LEMIEUX  
16 SHANÉE Y.W. NELSON

17 By: /s/ Ronald S. Lemieux

RONALD S. LEMIEUX

18 Attorneys for Defendant and Counterclaimant  
19 ChipMOS Technologies, Inc.  
20  
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23 IT IS SO ORDERED

24  
25 Dated: 4/1/11

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27 Jeremy Fogel, U.S. District Judge  
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SVI-89602v1